

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

RCG ADVANCES, LLC et al.

Defendants.

**Case No. 20-CV-4432-JSR**

**NOTICE OF MOTION TO  
WITHDRAW AS COUNSEL  
FOR THE FTC**

**PLEASE TAKE NOTICE** that the undersigned, as co-counsel to the Defendants RCG Advances, LLC (“RCG”) and Robert Giardina (“Mr. Giardina”), Joseph Mure Jr. & Associates (“JMA”) will move this Court, in the United States District Court for the Southern District of New York, 500 Pearl St., New York, New York 10007, on a date to be scheduled by the Court, for an Order withdrawing the Law Office of Joseph Mure Jr. & Associates, its attorneys Anthony C. Varbero and David C. Casagrande (collectively “JMA”), as attorneys of record for the RCG and Mr. Giardina, pursuant to Local Rule 1.4. JMA is not asserting a retaining or charging lien. JMA seeks to withdrawal due to RCG and Mr. Giardina’s replacing JMA with the law offices of J. Iandolo Law, PC and Kluger Peretz Kaplan LLP. *See* Exhibit A. JMA’s withdrawal will not result in any delay or any hearing in case.

Dated: March 21, 2023

Respectfully Submitted,  
/s/ Anthony C. Varbero  
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**CERTIFICATE OF SERVICE**

I, Anthony C. Varbero, hereby certify that on March 21, 2023, I electronically filed the foregoing Notice Of Motion To Withdraw Joseph Mure Jr. & Associates, Anthony C. Varbero and David C. Casagrande As Counsel For The Defendants RCG Advances and Robert Giardina and proposed order with the Clerk of the Court using its CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Anthony C. Varbero  
Anthony C. Varbero